

TECHLAW INC.

Superfund Records Center
SITE: Centredale
BREAK: 10.4
OTHER: 498868

160 N. WASHINGTON STREET, SUITE 400, BOSTON, MA 02114

PHONE: (617) 720-0320

FAX: (617) 720-0321

September 21, 2000

HAND DELIVERED

Anna Krasko, EPA WAM
U.S. Environmental Protection Agency, Region I
One Congress Street
Boston, MA 02114

Re: GSA – Environmental Advisory Services
Centredale Manor Site
Draft Findings Report

Dear Ms. Krasko:

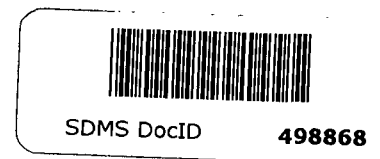
Pursuant to the Work Order referenced above and issued via purchase order to TechLaw, Inc., please find enclosed the Draft Findings Report for interviews with the following people:

- Jack Sabetta
- John Joyal
- Raymond Nadeau
- Dan Paterson
- Joseph Nadeau
- Shirley Eastham
- Anthony Caputo
- Nancy St. Pierre
- Anthony Baffoni
- Edmund Izzo
- Joseph Cifelli

Please call me with any questions or comments at (617) 720-0320 ext. 137.

Sincerely,

Pamela Sass Cahaly
Regional Program Manager



Details of a conference with Jack Sabetta - 9/8/00
By Blake Investigative Agency

Mr. Sabetta was employed by New England Container, as a truck driver, in 1969 and 1970.

He resides at [REDACTED] his telephone number is [REDACTED] and his D.O.B. is [REDACTED]. This report was prepared by the Blake Investigative Agency.

He worked at the Centerdale plant for 2 months in 1969 and at the Rt. 116 facility, during the duration of his employment. At the Centerdale plant, there were between 5 and 10 employees and approximately 10 truck drivers.

He delivered clean, reconditioned barrels to Ciba-Geigy in a stake body truck. Twice a week, he would deliver forty 55 gallon reconditioned drums to Ciba-Geigy. Approximately twice a month, he would transport 10 barrels from Ciba-Geigy to New England Container to be reconditioned. The Ciba-Geigy employees would load the barrels onto his truck and the barrels would be unloaded by New England Container employees. Because he did not have any contact with the barrels, he did not know if they contained any liquids or sludge.

New England Container parked one of their 40 foot trailers at Ciba-Geigy, which was loaded with barrels by Ciba-Geigy employees. The barrels were then transported to New England Container and an empty trailer was left to be refilled with barrels. He did not transport these barrels to New England Container, because he never drove the larger trucks.

As a truck driver, he had 2 other stops in the Warwick-Cranston area, whose names he could not recall.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Page II – Jack Sabetta Report – 9/8/00
By Blake Investigative Agency

At the Centerdale plant, there were barrels stacked on the ground, all around the facility. The barrels were stacked in horizontal pyramids. He did not know if they were leaking onto the ground. He had no contact with the barrel dump or knowledge of the barrel reconditioning operation.

He has no memory of any spills or leaks on his truck from the barrels that he transported and has never seen anything dumped or spilled onto the ground at the Centerdale facility.

New England Container had 6 stake body trucks, ranging in size between 15 and 25 feet, ten 40 foot trailers used to transport barrels, and three truck cabs to pull the trailers.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with John Joyal – 9/9/00
By Blake Investigative Agency

Mr. Joyal was employed as a batchmaker at Metro-Atlantic Chemical, from 1945 until 1973. He resides at [REDACTED], his telephone number is [REDACTED], and he is 92 years of age. This report was prepared by the Blake Investigative Agency.

As a batchmaker, he mixed various chemicals in kettles at the plant. He recalled using formaldehyde and various resins in this process. All of the batchmakers had recipe books, which detailed the amount and type of chemicals utilized in these kettles. He has recently disposed of his recipe book.

He said that if a bad batch was made, the liquid from the mixture was disposed into the river and the sludge was placed into barrels. He did not know where the contents of the barrels were disposed.

Mr. Joyal is 92 years old and his memory fades in and out.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with Raymond Nadeau – 9/9/00
By Blake Investigative Agency

New England Container employed Mr. Nadeau, from 1956 until 1969 as a laborer and a truck driver. He resides at [REDACTED] his telephone number is [REDACTED], and he is 65 years old. This report was prepared by the Blake Investigative Agency.

From 1956 until 1962, he worked in various jobs at the Centerdale plant. The barrels at the plant came from Massachusetts, Rhode Island, and Connecticut. They were brought to the facility on New England Container trucks and also purchased from various barrel dealers. These barrels usually contained some type of chemical residues. Barrels also came from the Metro-Atlantic plant. Some of these barrels were filled with a black sludge, which came from the Metro-Atlantic presses. The sludge was taken to the landfill located below the New England Container plant and dumped and then the barrels were reconditioned.

At the plant, the incoming barrels were unloaded from the trucks in amounts of up to 200 barrels per truck. They were then stacked onto the ground. If the barrels were open tops, they were stacked in an upright position. If they had covers on them, they were stacked on their sides in rows of 50 feet and 5 barrels high in a pyramid configuration. There were spills and leaks onto the ground from the barrels.

The initial step in the reconditioning process was to burn the barrels clean in the gas fired furnace, which contained 5 or 6 burners. The barrels were brought to a conveyor, which led into the burner. If there was a flammable liquid in the barrel, a match was thrown into the barrel to ignite the liquid and "burn it off," so that it did not explode in the burner.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Page II – Raymond Nadeau Report – 9/9/00
By Blake Investigative Agency

Some of these barrels came from a lacquer facility in Exeter, R.I., which made paints. The barrels were placed upside down on the conveyor belt and any remaining liquid or sludge drained into a cement pit underneath the conveyor. The barrels were then burned clean.

When the sludge pit was full, the contents, which were a mixture of all types of chemicals, including formaldehyde, was shoveled into barrels, which were taken to the landfill below the plant and emptied. Approximately two 55-gallon barrels of sludge were dumped onto the ground of the landfill per week.

Ash, from the material burned from the barrels in the furnace, was swept onto the ground adjacent to the burner or sometimes placed into barrels, which were emptied at the plant landfill.

After the barrels were burned clean, the dents were rolled out of the barrels and they were sand blasted and water tested for leaks. The dust residue from the sand blasting operation was also disposed at the plant landfill.

If the barrels did not pass the leak test, they were sold to the Park's Department of Warwick, R.I. If they passed, they were coated with a Teflon lining and the outside of the barrel was spray-painted. The barrels were then baked in an oven and stacked for shipment to the customer.

The barrels were spray painted different colors, depending on the customer's request. Paint, MEK, Toluene, and mineral spirits were used in this operation. These 3 gallon cans of the aforementioned chemicals were disposed as waste on a weekly basis at the plant landfill.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Page III – Raymond Nadeau Report – 9/9/00
By Blake Investigative Agency

From 1962 until 1969, he worked as a truck driver, who drove a straight body truck, which held up to 150 barrels. He delivered clean barrels and returned barrels to New England Container, for which New England Container paid, from the following companies:

1. U.S. Oil
E. Providence, R.I. An oil distributor, from which he would obtain 150 barrels, some with oil residue, per week.
2. Bradford Soap Works
Warwick, R.I. He would obtain 50 to 75 barrels with residue, every 2 weeks.
3. Warwick Chemical
Hope, R.I. He would obtain 150 barrels, between once and twice a week.
The barrels would contain up to 2 inches of liquid chemicals.
4. Eastern Chemical
N. Providence, R.I. On a weekly basis, he would obtain 20 to 30 barrels with chemical residues.
5. Koufax Packing
Pawtucket, R.I. This company made pie and cookie fillings. The waste in the barrels was lard.
6. Crown Chemicals
Providence, R.I. Every 2 weeks, he would obtain 75 barrels, which contained chemical residues.
7. Hoechst Chemical
Arctic, R.I.
(off Rt. 117) Once or twice a week, he would obtain 150 barrels which contained dye powder residues, which turned his clothes various colors and ate holes through them.
8. T.H. Baylis Chemical
Warwick, R.I. Every 2 weeks, he would obtain 30 to 40 barrels with chemical liquids, including mineral spirits, in them. This company's truck drivers also sold barrels to New England Container, which came from Baylis' customers.
9. Organic Chemical
Rt. 44
Providence, R.I. On a monthly basis, 10 to 12 barrels with chemical residues.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Page IV – Raymond Nadeau Report – 9/9/00
By Blake Investigative Agency

- | | |
|--|---|
| 10. DyTex Chemical

School Street
Pawtucket, R.I. | On a monthly basis, he obtained 30 barrels with liquid soap and cleaner fluid residues. |
| 11. Thompson Chemical
Attleboro, MA | This was strictly a delivery, there was no pick up of barrels. |
| 12. APEX
York Ave.
Pawtucket, R.I. | On a monthly basis, 150 barrels were picked up with clean motor oil residue in them. They would use the oil in the company trucks or their personal vehicles. |
| 13. Duoset
Rockville, CT
(Off Rt. 44) | Every 3 to 4 months, 150 barrels with chemical residues were obtained. |

There were additional companies, whose names he could not immediately recall, from where he would obtain barrels and transport them to New England Container to be reconditioned.

Besides New England Container's trucks, other barrel dealers brought barrels to the company and sold them to New England Container for reconditioning. These barrel dealers would buy or obtain barrels from various companies in Massachusetts, Rhode Island, and Connecticut and then sell them to New England Container. These barrels usually contained some type of waste material. The barrel dealers, whose names he could recall, were Mathews Barrel, Fall River, MA., and Efros Barrel, Providence, R.I. Efros Barrel brought 50 to 60 barrels to the facility, usually 2 to 3 times per week.

New England Container also sand blasted barrels from Farrell Barrel, but these barrels had already been burned clean, before they arrived at the plant.

Mr. Nadeau will sign an affidavit, containing the aforementioned information and review a New England Container customer list, in an attempt to recall any additional barrel pick ups.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with Dan Paterson – 9/10/00
By Blake Investigative Agency

Mr. Paterson was employed in Shipping and Receiving at Metro-Atlantic, from 1953 until 1969. He resides at [REDACTED] his telephone number is [REDACTED], and his D.O.B. is [REDACTED]. This report was prepared by the Blake Investigative Agency.

His job involved loading and unloading trucks and he became a shipper during the last 2 or 3 years of his employment at the plant.

Liquids were not handled by his department. They arrived at Metro-Atlantic in tanker trucks, which pumped the liquids into storage tanks. His department did handle 100 pound bags of urea, which was used in the production process. The main products shipped to the customer were cotton softeners. He had no information on phosogene.

Waste was not shipped out through his department and he had no memory of any waste hauler coming to the facility to remove plant waste.

He had no contact with New England Container and no knowledge of waste disposal into the river.

**Details of a conference with Joseph Nadeau – 9/10/00
By Blake Investigative Agency**

New England Container and Metro-Atlantic employed Mr. Nadeau, from 1962 until 1965.

He resides at [REDACTED] his telephone number is [REDACTED] and his D.O.B. is [REDACTED]. This report was prepared by the Blake Investigative Agency.

He worked part time during the summers of 1962, 1963, and 1964, when he was in high school, and became full time in 1964 and 1965. He worked at both facilities as did some of the other employees, who were interchangeable, between New England Container and Metro-Atlantic.

At New England Container, he loaded clean barrels onto trucks, unloaded incoming barrels from trucks, and loaded barrels onto the conveyor, which fed the barrel furnace.

Reconditioned barrels were sold to Metro-Atlantic, sold as "burn barrels," barrels used to burn waste usually household, or sold to New England Container's customers.

Incoming barrels were stored on the ground. Some of them contained dyes or emitted a chemical odor. The materials in these barrels leaked onto the ground around the plant. A large amount of these materials were various types of resins. He would buy new work clothes and shoes on a weekly basis, due to the amount of waste materials that would accumulate on his clothes and shoes, while working in the area in and around the facility.

At the barrel furnace, the barrels were placed upside down and open on the conveyor belt, this allowed any remaining liquid or sludge to drain into a pit below the conveyor. He did not know how or where this waste in the pit was disposed. He has never been to the plant landfill.

At Metro-Atlantic, he was involved in the production of Reserve Salt, which was a type of metal stripper, and contained a mixture of sulfuric acid, sulfan, caustic, water, and other materials, whose names he could not recall. It was mixed in 5,000-gallon tanks, which were 8 to 10 feet high,

Privileged Work Product Prepared in Anticipation of Litigation

Page IV –Joseph Nadeau Report – 9/10/00
By Blake Investigative Agency

and then cooked under pressure. After it had been cooked, it was filtered through a series of canvas filters. Drippings from the filters were recycled. What remained in the tank as waste was a black sludge, which was dumped from the tank onto the floor of the plant. It was then shoveled into barrels, filling 3 to 4 fifty-five gallon barrels, and the remaining material on the floor was hosed into floor drains, which drained into the canal on the left side of the building. He did not know where the barrels of black sludge were disposed. Metro-Atlantic used to make 2 to 3 batches of Reserve Salt each week.

The company also made a product called Rainpel, used in waterproofing and was a mixture of wax and fishoil (N-Methol-Taurine).

Sulfan, a product used in the making of Reserve Salt, would burn holes in the workers' skin. The kettle, used to make Reserve Salt, was made of stainless steel with stainless steel paddles, because the Reserve Salt quickly "rotted out" ordinary steel.

Details of a conference with Shirley Eastham – 9/11/00
By Blake Investigative Agency

Mrs. Eastham was employed by Metro-Atlantic in a clerical position in the office, from 1955 until 1961. She resides at [REDACTED] her telephone number is [REDACTED], and she is 63 years old. This report was prepared by the Blake Investigative Agency.

She worked in the office and was involved in the typing of letters and the filing of materials. She had no information on the production process or on the types of chemicals employed in this process. She said she was told to avoid the production area, because of the oily floors.

She had no information on New England Container's customers or from which barrel dealers they purchased barrels.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with Anthony Caputo – 9/11/00
By Blake Investigative Agency

Mr. Caputo was the Chief Surveyor for Waterman Engineering, the company which surveyed the Brook Village property, prior to construction of the building in 1976. He resides at [REDACTED] and his telephone number is [REDACTED]. This report was prepared by the Blake Investigative Agency.

He did not do the actual survey, which he said was done by Donald Perron. His name was on the report, because he was the Chief Surveyor, who oversaw a crew of surveyors.

He was at the site for one day and recalled seeing old ruins from a mill building, concrete slabs, and an area of asphalt in the front section of the property. There was a 24 inch storm drain in the northwest corner of the property.

In the marsh area located at the lower end of the property, he recalled seeing 7 or 8 barrels scattered on the ground. The marsh water was rusty in color and he remembered telling one of the rod men not to step in it. He described the area as being dirty, in general.

The actual survey was done in September 1975 and he went back in October, 1976 to recheck the site for changes, as stated on the survey report.

The architects for the project, Robinson, Green, and Beretta, would have taken soil borings, prior to construction. He said that they might have sampled the borings for chemical contamination.

Details of a conference with Nancy St. Pierre – 9/11/00
By Blake Investigative Agency

Ms. St. Pierre was employed by Metro-Atlantic Chemical as a secretary in the office, from 1956 until 1963. She resides at [REDACTED] and her telephone number is [REDACTED]. This report was prepared by the Blake Investigative Agency.

She worked in the sales office, after which she became Mr. Buonanno's personal secretary. The company sold its products mainly to companies involved in the textile trade. There was a dye lab at the plant.

She had no information on the chemicals utilized in the production process or how waste products were disposed. She had no memory of phosgene or Eli Lilly and no information on barrel dealers, who sold barrels to New England Container.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with Anthony Baffoni – 9/12/00
By Blake Investigative Agency

Mr. Baffoni is a truck driver, who I was told was formerly employed by Pezza Construction, which was involved in construction at the site. He resides at [REDACTED] and his telephone number is [REDACTED]. This report was prepared by the Blake Investigative Agency.

He had no information on the condition of the site, prior to the construction of Brook Village.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with Edmund Izzo – 9/12/00
By Blake Investigative Agency

New England Container employed Mr. Izzo, from 1959 until 1969. He resides at [REDACTED]

[REDACTED], his telephone number is [REDACTED], and his D.O.B. is [REDACTED].

This report was prepared by the Blake Investigative Agency.

He worked as a laborer at various jobs, throughout the facility. Barrels came from Rhode Island and Massachusetts to the plant, but he did not know from what companies the barrels came.

Barrels, which were ¼ to ½ full with liquids or sludges, were taken to the landfill below the plant and emptied. Approximately 10 barrels were taken to be emptied each month. The material dumped onto the ground was left there and never burned. The dump area also was used for the disposal of barrels, which could not be reconditioned.

The barrel furnace was located outside the building and had no roof. The barrels were placed upside down and open onto the furnace conveyor and anything in the barrels drained onto the ground including paint thinners, lacquers, formaldehyde, paints, and other chemicals. This material was shoveled into a pile, adjacent to the barrel furnace. The pile was a sludge of various colors, including yellow, green, and red. When so much had been accumulated, it was shoveled into barrels and taken to the plant landfill and dumped onto the ground.

He would occasionally go to U.S. Oil, with one of the truck drivers, and help unload the reconditioned barrels.

Mr. Izzo will sign an affidavit, concerning the aforementioned information.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Details of a conference with Joseph Cifelli - 9/13/00
By Blake Investigative Agency

Mr. Cifelli was employed by New England Container, from 1954 until 1969 at the Centerdale plant, and from 1969 until 1971 at the new facility on Rt. 116. He resides at [REDACTED] [REDACTED] and his telephone number is [REDACTED]. This report was prepared by the Blake Investigative Agency.

From 1954 until 1969, he worked at various jobs, throughout the facility. The barrels were burned in an open end gas fired furnace, that was originally located outside of the south end of the building. After a few years, it was relocated to the west side of the building. Barrels were placed open end down onto a conveyor, which fed into the furnace, where the barrels were burned clean. Any sludge or liquid drained out of the barrel and into a sludge pit, below the conveyor. He did not know how the sludge pit was cleaned or where the waste was disposed.

He said the Centerdale Building in Brook Village was constructed directly on the area, where the New England Container Building had been located.

If there was too much liquid in a drum, it was taken to the barrel dump and emptied. Barrels, that could not be reconditioned, were also disposed there.

Barrels with liquids and sludges in them were stored on the ground, below the plant (see diagram). Some of these eventually rusted out and their contents leaked onto the ground.

Other barrels leaked their contents onto the ground if the bungs had been removed, when they were stored on their sides. Liquids also leaked onto the ground from barrels, when they were stored on their sides on the ground, prior to their entering the barrel furnace. Flammable liquids,

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential

Page II – Joseph Cifelli Report – 9/13/00
By Blake Investigative Agency

such as Ethylene, Toluene, and Trichloroethylene were dumped onto the ground (see diagram) in the central area between the river and the tailrace south of the building.

Barrels were sold to New England Container from various barrel dealers, including Worcester Barrel, Worcester, MA., Mathew Barrel, Fall River, MA., and Efros Barrel, Providence, R.I. There were many more barrel dealers who sold barrels to New England Container, but he could not recall their names.

Barrels also came from Metro-Atlantic to be cleaned and reconditioned.

In 1960, he became a part time truck driver, who drove a trailer truck for New England Container and picked up and delivered barrels to the following companies. The barrels, which he picked up, were taken to New England Container for reconditioning.

- | | |
|--|---|
| 1. George Mann
Providence, R.I. | On a monthly basis, he picked up between 20 and 40 barrels with chemical residues in them. These residues were in liquid and powder form. |
| 2. Crown Chemical
Pawtucket, R.I. | On a monthly basis, he picked up between 20 and 40 barrels, which contained chemical residues. These residues were in liquid and powder form. |
| 3. Warwick Chemical
N. Kingston, R.I. | On a monthly basis, he picked up between 20 and 40 barrels, which contained liquid and powder chemical residues. |
| 4. T.H. Baylis | On a monthly basis, he picked up between 30 and 35 barrels, which contained liquid and powder chemical residues. |

Mr. Cifelli will sign an affidavit, concerning the aforementioned information and will go to the site and point out the areas he mentioned in the report, if necessary.

Privileged Work Product Prepared in Anticipation of Litigation

Enforcement Confidential